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February 12, 2014

Via Email (Joshua_Card@nysd.uscourts.gov)

Hon. Paul G. Gardephe
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

**Re: 1:08-cv-08060-PGG, *In re: The Reserve Primary Fund Securities
& Derivative Class Action Litigation***

Dear Judge Gardephe:

Pursuant to paragraph 11 of the Order and Final Judgment entered on January 13, 2014 in the above-referenced action, we respectfully write, on behalf of defendants, to “provide the Court with a status update” as to our “best efforts to resolve the ... Massachusetts Action.”

Since entry of the above-referenced Order, we have had multiple discussions with the Massachusetts Securities Division (the “MSD”) concerning a possible settlement. After initial talks, on January 28, 2014 the MSD forwarded us a written settlement proposal. Thereafter, on February 5, 2014, defendants responded with a written counter-proposal. After further and ideas were exchanged in a conference call on February 7, 2014, we revised our written counter-offer, which we will be submitting to the MSD later today.

While there is still some distance between the two sides’ positions, the gap has been narrowing, and we are hopeful an agreement can be reached in the coming weeks. It should be noted that our firm only represents three of the four respondents to the Massachusetts Action (Reserve Management Company, Inc., Resrv Partners, Inc., and Bruce R. Bent II). A fourth respondent (Reserve Funds Trust) is represented by separate counsel, who will be separately reporting to the Court regarding that respondent’s settlement discussions .

We are available to answer any questions the Court may have.

Sincerely,

John Dellaportas

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cc: [Via Email]
John C. Browne, Esq.
Mark Holland, Esq.
Tariq Mundiya, Esq.